

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR TRANSPORTING AND HARBORING ILLEGAL ALIENS

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
MERLIN MIRELES	*	VIOLATION: 8 U.S.C. § 1324(a)(1)(A)(ii)
GLORIA MIRELES	*	8 U.S.C. § 1324(a)(1)(A)(v)(I)
	*	8 U.S.C. § 1324(a)(1)(A)(iii) and
		(v)(II)
	* * *	

The Grand Jury charges that:

COUNT 1

A. **AT ALL TIMES MATERIAL HEREIN:**

1. The defendant, **MERLIN MIRELES**, was a commissioned United States Customs and Border Protection Officer, assigned to the Port of Progreso, in the Southern District of Texas.

2. A Mexican woman, referred to by her initials M.C.-G., and her two minor children, were undocumented aliens residing illegally in the United States.

B. **TRANSPORTING ILLEGAL ALIENS:**

During or about the summer of 2004, in the Eastern District of Louisiana and

elsewhere, the defendant, **MERLIN MIRELES**, knowing and in reckless disregard of the fact that M.C.-G. and her two minor children had come to, entered and remained in the United States in violation of law, did transport and move said aliens from the Southern District of Texas to the Eastern District of Louisiana within the United States by means of transportation and otherwise in furtherance of such violation of law; all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

COUNT 2

A. The allegations set forth in paragraph A of Count One are incorporated by reference herein.

B. **HARBORING ILLEGAL ALIENS:**

During or about the summer of 2004, up to and including on or about February 17, 2005, in the Eastern District of Louisiana, the defendants, **MERLIN MIRELES** and **GLORIA MIRELES**, aiding and abetting each other, knowing and in reckless disregard of the fact that M.C.-G. and her two minor children, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection and did attempt to conceal, harbor, and shield from detection such aliens in buildings owned by **MERLIN MIRELES** and **GLORIA MIRELES**; all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and (v)(II).

COUNT 3

A. The allegations set forth in paragraph A of Count One are incorporated by reference herein.

B. **CONSPIRACY TO HARBOR ILLEGAL ALIENS:**

During or about the summer of 2004, up to and including on or about February 17, 2005, in the Eastern district of Louisiana and elsewhere, the defendants, **MERLIN MIRELES** and **GLORIA MIRELES**, knowing and in reckless disregard of the fact that M.C.-G. and her two minor

children had come to, entered and remained in the United States in violation of law, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to conceal, harbor and shield from detection and attempt to conceal, harbor, and shield from detection said aliens in buildings, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii);

C. OVERT ACTS

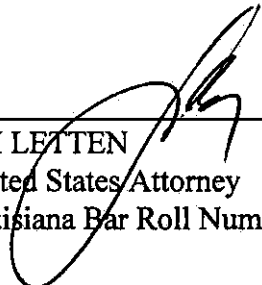
In furtherance of the conspiracy and to accomplish the objects thereof, the defendants **MERLIN MIRELES** and **GLORIA MIRELES** committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. **MERLIN MIRELES** assisted M.C.-G. in registering her two minor children in public schools in the Southern District of Texas;
2. During or about the summer of 2004, **MERLIN MIRELES**, transported M.C.-G. and her two minor children in his pick-up truck from the Southern District of Texas to the Eastern District of Louisiana;
3. During or about the summer 2004 to about February 2005, **MERLIN MIRELES** and **GLORIA MIRELES** provided two places to live for M.C.-G. and her two minor children in Jefferson Parish, in the Eastern District of Louisiana;
4. **GLORIA MIRELES** assisted M.C.-G. in registering her children for the 2004-05 school year in Jefferson Parish public schools in the Eastern District of Louisiana;
5. During or about October 2004, **GLORIA MIRELES** assisted M.C.-G. in securing part-time employment at a plumbing business in Jefferson Parish, in the Eastern District of Louisiana;


All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

A TRUE BILL:

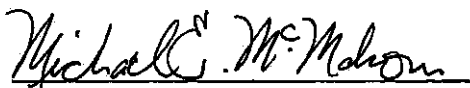
FOREPERSON



JIM LETTEN
United States Attorney
Louisiana Bar Roll Number 8517



IAN MASELLI MANN
First Assistant U.S. Attorney
Louisiana Bar Roll Number 9020



MICHAEL E. MCMAHON
Assistant United States Attorney
Louisiana Bar Roll Number

New Orleans, Louisiana
February 13, 2009